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12 *Attorneys for Defendants*  
13 *MGM Grand Hotel, LLC and*  
14 *MGM Resorts International*

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 TRACEY KOONCE, an individual,  
18 Plaintiff,

19 vs.

20 MGM GRAND HOTEL, LLC, a Nevada  
21 Limited Liability Company; DOES I-X,  
22 inclusive; and ROE CORPORATIONS I-X,  
23 inclusive,

24 Defendants.

25 Case No.: 2:22-cv-02061-CDS-DJA  
(Lead Case)

26 **STIPULATION AND ORDER TO**  
27 **EXTEND TIME TO RESPOND TO**  
28 **PLAINTIFFS' CONSOLIDATED**  
29 **COMPLAINT**

30 (First Request)

31 Consolidated With:  
32 Case No.: 2:22-cv-02069-CDS-DJA

33 PAUL TAYLOR, an individual,  
34 Plaintiff,

35 vs.

36 MGM GRAND HOTEL, LLC, a Nevada  
37 Limited Liability Company; DOES I-X,  
38 inclusive; and ROE CORPORATIONS I-X,  
39 inclusive,

40 Defendants.

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1 DAVID PERSI, an individual,  
2 Plaintiff,  
3 vs.  
4 MGM GRAND HOTEL, LLC, a Nevada  
5 Limited Liability Company; DOES I-X,  
6 inclusive; and ROE CORPORATIONS I-X,  
7 inclusive,  
8 Defendants  
9 INGA HAKAN, an individual,  
10 Plaintiff,  
11 vs.  
12 MGM RESORTS INTERNATIONAL, a  
13 Foreign Corporation; DOES I-X, inclusive;  
14 and ROE CORPORATIONS I-X, inclusive,  
15 Defendants.

Consolidated With:  
Case No.: 2:22-cv-02087-CDS-DJA

Consolidated With:  
Case No.: 2:22-cv-02087-CDS-DJA

13 IT IS HEREBY STIPULATED by and between Plaintiffs and Defendants, by and through  
14 their respective counsel, that Defendants MGM Grand Hotel, LLC and MGM Resorts International  
15 ("Defendants"), shall have an extension up to and including September 15, 2023, in which to file  
16 their response to Plaintiffs' Consolidated Complaint. This Stipulation is submitted and based upon  
17 the following:

18 1. That this is the first request for an extension of time for Defendants to answer  
19 Plaintiffs' Consolidated Complaint.

20 2. Due to the length of Plaintiffs' Consolidated Complaint (41 pages, 398 paragraphs),  
21 and the inclusion of a new cause of action relating to at least one of the Plaintiffs, Defendants  
22 require additional time to complete their response.

23 3. The parties agreed to extend Defendants' deadline to file a responsive pleading from  
24 September 8, 2023, to September 15, 2023.

25 4. Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect  
26 of or be construed as waiving any claim or defense held by any party hereto.

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5. That this request is made in good faith and not for the purpose of delay

Dated this 8th day of September, 2023.

## JENNINGS & FULTON, LTD.

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## *Attorneys for Defendants*

## **ORDER**

IT IS SO ORDERED:

Daniel J. Albrechts

Daniel J. Albregts  
United States Magistrate Judge

Dated: 9/8/2023